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May 11, 1999

James K. Smith
Director
Federal Relations

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation**
CC Docket 99-35, Local Number Portability

Dear Ms. Salas:

A meeting was held today between members of the Competitive Pricing Division (Chris Barnekov, Raj Kannan, Doug Galbi, Carol Canteen, Josephine Simmons, John Scott and Rhonda Lien) and representatives of Ameritech (Mike Suthers, Therese Lasswell, Richard Wood, Paul Sorbello, Roger Marshall, and Jim Smith) to discuss Ameritech's Direct Case filed in this proceeding, as well as to respond to questions raised by the staff.

Attachment 1 includes responses to a series of questions raised by the staff prior to the meeting.

Attachment 2 includes the following material covered at the meeting:

- Updated version of Appendices C and D which have been revised to correct discrepancies between the versions originally filed as part of Ameritech's Direct Case.
- Reconciliation between the originally filed Appendices C and D and the revised Appendices C and D.
- Examples of how different types of cost flow through Ameritech's LNP cost study as set forth in Appendix F of its Direct Case.
- Additional explanation of SS7 cost material filed in Appendix B of Ameritech's Direct Case.

Also included in Attachment 2 is additional material which is being provided to the staff in response to questions raised at the meeting, including a breakdown of capital and


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expense dollars allocated between LNP services and a breakdown of certain loading factors used in Ameritech's cost study.

Attachment 2 is being filed under confidential treatment. A public copy of the attached, with the confidential information redacted, is being submitted today under separate cover.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. Smith". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Attachments

cc: C. Barnekov
R. Kannan
D. Galbi
C. Canteen
J. Simmons
J. Scott
R. Lien

ATTACHMENT 1

**AMERITECH'S ANSWERS TO
FIRST SET OF BUREAU QUESTIONS**

- Q.1. PREDICTOR: Why is it necessary to identify exported numbers for repair purposes?
- A. Predictor does not identify and track ported out telephone numbers. All OSS costs associated with Predictor are required to port numbers into Ameritech's network.
- Q.2. DBASII: Please identify the cost of the original or unmodified DBAS system, without the number portability functionality, in your cost support information. Also identify in your cost support information the incremental cost of the modified system with the number portability functionality.
- A. The DBASII costs in Ameritech's Direct Case are for modifications required to support LNP only, and include no costs of the system without LNP capabilities. DBAS has been a part of the Ameritech OSS infrastructure prior to LNP implementation (since the early 1980's). Thus, costs for long term investments in DBAS would be difficult to ascertain. Appendix C only includes the costs required to upgrade DBAS to enable LNP processing. In addition, it is noted that Bell Atlantic identified the same modifications in their Appendix A – page 5.
- Q.3. EMAC: Same as question 1. Why is it necessary to track the facilities associated with numbers that have been ported out? Does the tracking occur indefinitely? How does this tracking system work along with the NSDB, which deletes records?
- A. EMAC is Ameritech's telephone number administration system in Wisconsin. Tracking of telephone numbers ported to another carrier is required to avoid the "double assignment" of a ported number to an Ameritech end user.
- Q.4. IBM Global Services: Is there a pre-existing contract? Please identify the cost of the original contract in the cost support information, before the LNP modification, and identify the increments cost after the LNP modification.
- A. Yes, there is an existing contract between Ameritech and IBM. This contract includes support for the entire Ameritech OSS infrastructure. None of the costs resulting from the original cost study were included in Ameritech's LNP cost study. However, the original contract did not include the hardware support required for Order Path, Number Manager or the associated links to the NPAC SMS. Therefore, the costs identified in Ameritech's cost model were required for LNP in support of the Order Path and Number Manager systems and associated links required to provide LNP, and were appropriately included in the cost study.

- Q.5 LMOS/MLT: Same as questions 1 and 3. Why is it necessary to keep the line record information or issue a trouble report on a number that has been ported out? Again, how does this record keeping mechanism work along with the NSDB which deletes records? Please explain how MLT was modified to recognize or track, for testing purposes, numbers that have been ported out.
- A. LMOS/MLT must be able to recognize whether a telephone number is truly “disconnected” or ported out. This distinction is required to enable a technician to take appropriate action upon receipt of a trouble report from a customer. NSDB does not delete a ported out telephone number. The MLT system was modified to track ported in telephone numbers only. It did not require upgrades to support ported out telephone numbers.
- Q.6 NPAC: Do these figures represent your portion of costs shared with other carriers? When is this cost located in your cost support? What type of modification of your own system was required?
- A. The NPAC figures represent Ameritech’s share of allocated costs over the period of the contract with Lockheed Martin. The costs are located in the Wholesale cost Study, page 17 – line 3. Ameritech’s interfaces to the NPAC are noted in Appendix C (i.e., Order Path and Number Manager). These systems were not modified but were new systems added to Ameritech’s OSS infrastructure to support the introduction of LNP and the NPAC architecture.
- Q.7. Order Path/SOAC: Where does one of these services stop functioning and the other pick up in processing LNP service orders? Do they function simultaneously? Please explain?
- A. SOAC parses out required porting data from service orders and forwards it to Order Path for NPAC SMS processing. These processes are sequential. Once the data is provided from SOAC, Order Path then processes it and forwards it on to NPAC SMS.
- Q.8 WFA/C/DI/DO: Same as questions 1, 3, and 5. Once a number has been ported out, what maintenance is related to this system regarding that number? Where in the cost support is the NSBD-WFA/C without the LNP functionality and where is the cost with the LNP functionality?
- A. WFA components must be able to recognize whether a telephone number is truly “disconnected” or ported out. This distinction is required to enable a technician to take appropriate action upon receipt of a trouble report from a customer. The costs identified in Appendix C were purely for LNP-required modifications.
- Q.9 MARCH: Is the translation device capable of performing 10-digit translations for other services? If so, please name them and state how much of the cost of the modification has been allocated to those services.

- A. MARCH was only capable of provisioning 10 digit telephone numbers on “native” telephone numbers. MARCH was not capable of recognizing imported telephone numbers. Modifications enabled MARCH to recognize “non-native” telephone numbers and other service order provisioning data (e.g., LRN) and formulate translations for each switch type deployed in the Ameritech network.
- Q.10 911: Please state where the cost support shows the cost of the 911 system without the LNP functionality and the cost of the system with the LNP functionality.
- A. All costs identified in Ameritech’s cost study come from the contract between Ameritech and its 911 provider. This contract covers only functions related to provisioning and maintaining LNP records in the 911 data base. Without these modifications, a CLEC could not keep its customer records up to date or be notified of any problems.
- Q.11 FIRST and MYNAH/PAWS: Are these services related? If so how so and how are they different?
- A. No, these services are not related. Please refer to Appendix C for further system description.
- Q.12 LINK MONITORING: Please explain why additional monitoring points are necessary? Is Remote Access required solely to support LNP or does it support other SS7 services? If so, how has the cost been allocated between the LNP and non-LNP services? Where are the figures in its cost support to show Link Monitoring with and without LNP?
- A. No costs were allocated in Appendix C for Link Monitoring.
- Q.13 NSDB: Please explain the difference between the NSDR identification of ported out numbers and the LMOS identification of port out telephone numbers. Are both for proper trouble repairs resolution? If they differ, please explain.
- A. Both NSDB and LMOS are used for trouble resolution. However, these systems track different circuit types for different Ameritech business units. Therefore, upgrades were required for both OSS components in support of LNP.

**AMERITECH'S ANSWERS TO
SECOND SET OF BUREAU QUESTIONS**

- Q.1. What is the software buyout referred to in end-office expense, as shown on pages 12-16 and 17 of the workbook 1187 cost.xis (the retail cost study)?
- A. The software buyout is part of the EWSD LNP buyout, under which Ameritech purchased all switch software, and software modifications necessary to provide LNP in bulk and at a discount for all its offices. The buyout included software and hardware necessary to make the LNP software function.
- Q.2. Does the SCP/SMS platform capital or expense on pages 12 and 17 of 1187 cost.xis include "loading factors"?
- A. No.
- Q.3. Do the investments on pages 6-11 of 1187 cost.xis include loading factors (for power, buildings land, etc.)?
- A. No.
- Q.4. What is the source of the investment figures on pages 6-11 of 1187 cost.xis?
- A. Pages 12-17 of Appendix C attached to Ameritech's LNP Direct Case.

ATTACHMENT 2

CONFIDENTIAL MATERIAL
